

JARED BOBROW (Bar No. 133712)
jared.bobrow@weil.com
JOSEPH H. LEE (Bar No. 248046)
joseph.lee@weil.com
WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065
Telephone: (650) 802-3000
Facsimile: (650) 802-3100

KEVIN KUDLAC (*pro hac vice*)
kevin.kudlac@weil.com
WEIL, GOTSHAL & MANGES LLP
8911 Capital of Texas Highway
Building One, Suite 1350
Austin, TX 78759
Telephone: (512) 349-1930
Facsimile: (512) 527-0798

Attorneys for Defendant
LEXAR MEDIA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JENS ERIK SORENSEN, as Trustee of
SORENSEN RESEARCH AND
DEVELOPMENT TRUST,

Plaintiff,

v.

LEXAR MEDIA, INC., a Delaware corporation;
and DOES 1 - 100,

Defendants.

Case No. C08-00095 JW RS

DECLARATION OF JOSEPH H. LEE IN
SUPPORT OF DEFENDANT LEXAR
MEDIA'S MISCELLANEOUS
ADMINISTRATIVE REQUEST TO FILE
DOCUMENTS UNDER SEAL

Date: September 12, 2008
Time: 10:00 a.m.
Courtroom: 8, 4th Floor
Judge: Hon. James Ware

1 I, Joseph H. Lee, declare:

2 1. I am a member of the Bar of this Court and an associate with the law firm
3 of Weil, Gotshal & Manges LLP, counsel of record for Lexar Media, Inc. ("Lexar") in the above-
4 captioned matter. I submit this declaration based on personal knowledge and following a
5 reasonable investigation. If called upon as a witness, I could competently testify to the truth of
6 each statement herein.

7 2. Lexar hereby requests, pursuant to Civil Local Rules 7-11 and 79-5, an
8 order sealing the following documents:

- 9 • Unredacted version of the Declaration of Melody Kramer in Support of
10 Supplemental Brief to Plaintiff's Motion For Application Of 35 U.S.C.
11 § 295 Presumption Of Infringement ("Kramer Decl.");
- 12 • Exhibits C-H and K-M to the Kramer Decl.;
- 13 • Unredacted version of the Supplemental Declaration of Stephen Petrie,
14 Ph.D. in Support of Plaintiff's Supplemental Briefing in Support of Motion
15 For Application Of 35 U.S.C. § 295 Presumption Of Infringement ("Petrie
16 Decl.");
- 17 • Exhibits 1-10 and 12-14 to the Petrie Decl.; and
- 18 • Unredacted Supplemental Brief in Support of Plaintiff's Motion For
19 Application Of 35 U.S.C. § 295 Presumption Of Infringement.

20 3. Upon information and belief, the documents mentioned in paragraph 2
21 above, contain information that has been designated as "Confidential" or "Highly Confidential -
22 Attorneys' Eyes Only" under the Protective Order in this case, and relate to the process by which
23 the product accused by the Plaintiff of being made by an infringing process is manufactured. The
24 disclosure of these documents, for instance, to competitors or others in the industry, may harm
25 Lexar and/or its suppliers.

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